A1/A1/CO Steve Thompson 1100804609 01

TUNG

Rhodia
*Member of the Solvay Group*
*Houston Plant*

RECEIVE

**CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 2795)**

April 9, 2012

APR 13 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
January 1, 2012 to March 31, 2012
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William J McConnell

William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

**Table 1**

**Rhodia Inc.**
**Houston, Texas**
**Benzene Waste NESHAP Inspection Requirements**
**For Quarterly Period Ending: March 31, 2012**

| Inspection | Was inspection performed? | Exceptions Noted |
|---|---|---|
| Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of tank covers and openings per 61.343(c) | x Yes<br>Except as Noted | |
| Initial and annual Method 21 inspections of containers per 61.345(a)(1) | x Yes<br>Except as Noted | |
| Initial and quarterly visual inspections of containers per 61.345(b) | x Yes<br>Except as Noted | |
| Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii) | x Yes<br>Except as Noted | |
| Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f) | x Yes<br>Except as Noted | |
| Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c) | x Yes<br>Except as Noted | |

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

A1/A1/CO

Steve Thompson

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Rhodia

*Member of the Solvay Group*
*Houston Plant*

RECEIVE

OCT 17 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

**CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 3433)**

October 9, 2012

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF Quarterly Report
July 1, 2012 to September 30, 2012
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

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- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

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- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William J. McConnell

William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

**Table 1**

**Rhodia Inc.**
**Houston, Texas**
**Benzene Waste NESHAP Inspection Requirements**
**For Quarterly Period Ending: September 30, 2012**

| Inspection | Was inspection performed? | Exceptions Noted |
|---|---|---|
| Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of tank covers and openings per 61.343(c) | x Yes<br>Except as Noted | |
| Initial and annual Method 21 inspections of containers per 61.345(a)(1) | x Yes<br>Except as Noted | |
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| Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii) | x Yes<br>Except as Noted | |
| Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f) | x Yes<br>Except as Noted | |
| Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c) | x Yes<br>Except as Noted | |

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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Thompson T079 vol 7

Rhodia
*Member of the Solvay Group*
*Houston Plant*

RECEIVE

**CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 3945)**

APR 10 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

April 3, 2013

Mr. David Neleigh
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Rhodia Benzene NESHAP, Subpart FF, Quarterly Report
January 1, 2013 to March 31, 2013
EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Solvay
Houston Plant
8615 Manchester Street
Houston, TX 77012

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William McConnell
Plant Manager
Rhodia Inc., Member of the Solvay Group

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

Solvay
Houston Plant
8615 Manchester Street
Houston, TX 77012

**Table 1**

**Rhodia Inc.**
**Houston, Texas**
**Benzene Waste NESHAP Inspection Requirements**
**For Quarterly Period Ending: March 31, 2013**

| Inspection | Was inspection performed? | Exceptions Noted |
|---|---|---|
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| Quarterly visual inspections of tank covers and openings per 61.343(c) | x Yes<br>Except as Noted | |
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| Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii) | x Yes<br>Except as Noted | |
| Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f) | x Yes<br>Except as Noted | |
| Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c) | x Yes<br>Except as Noted | |

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

Solvay
Houston Plant
8615 Manchester Street
Houston, TX 77012

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Rhodia
*Member of the Solvay Group*
*Houston Plant*

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7011 2000 0001 4575 3815)**

Steve Thompson

February 28, 2013

Mr. Jeff Robinson
Air Permits Section
Mail Code 6PD-R
U.S. EPA – Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Benzene Waste Operations NESHAP
Industrial Solid Waste Registration No. 31019
Hazardous Waste Permit No. HW-50095
40 CFR Part 61, Subpart FF
EPA ID No. TXD008099079

Dear Mr. Robinson:

Enclosed please find a report for the 2012 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 54.4 megagrams for the operating year 2012.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2012.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson
Environmental Manager
Rhodia Inc., Member of the Solvay Group

Attachment

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

CC: Air Section Manager, TCEQ, Region 12, Houston
Mr. Bob Allen, Director, Environmental Public Health Division,
Harris County Public Health and Environmental Services
Mr. Arturo Blanco, City of Houston, Bureau of Air Control

Rhodia Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

Rhodia Inc. Houston Plant
Calendar Year 2012 Annual Benzene Report

40 CFR 61 Subpart FF - Benzene Annual Report

| 61.357(a)(2) | | 61.357(a)(3)(i) | 61.357(a)(3)(ii) | 61.357(a)(3)(iii) | 61.357(a)(3)(iv) | 61.357(a)(3)(v) | 61.357(a)(3)(vi) |
|---|---|---|---|---|---|---|---|
| Waste Stream | Controlled Benzene Emissions | Water Content of Waste Stream >10% | Waste Stream a Process Wastewater Stream, Product Tank Drawdown, or Landfill Leachate | Annual Waste Quantity (Mg/yr) | Range of Benzene Concentration (ppmw) | Annual Average Flow Weighted Benzene Concentration (ppmw) | Annual Benzene Quantity (Mg/yr) |
| 9109003 | Y | Y | Y | 380.2 | 0-10 | 10 | 0.0 |
| 9104004 | Y | N | N | 422.7 | 10-200 | 200 | 0.1 |
| 0312003 | Y | N | N | 144.8 | 0-10 | 10 | 0.0 |
| 0312002 | Y | N | N | 993.7 | 10,000-50,000 | 50,000 | 49.7 |
| 1206005 | Y | Y | Y | 134.5 | 0-20,000 | 20,000 | 2.7 |
| 1205001 | Y | N | N | 160.2 | 0-10 | 10 | 0.0 |
| 0912006 | Y | N | N | 1398.9 | 0-1,000 | 1,000 | 1.4 |
| 9405021 | Y | Y | Y | 247.2 | 10-2,000 | 2,000 | 0.5 |
| | Y=Yes, N=No | Y=Yes, N=No | Y=Yes, N=No | | | TOTAL | 54.4 Mg/yr |

AT/AI/CO FRS #110010460901

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Rhodia
A Member of the Solvay Group
Houston Plant

**Certified Mail: Return Receipt Requested (7011 2000 0001 4575 4065)**

RECEIVE

OCT 17 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

July 30, 2013

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

RE: Rhodia Inc.
Houston, Texas
Title V Semi-Annual Deviation Report
Permit No.: O-3049
Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the semi-annual Title V deviation report for the Rhodia Houston, Texas facility which covers the period from June 29, 2013 to August 31, 2013. This report is being submitted to change the reporting semiannual reporting period for permit O-3049.

Sincerely,

David Laurie
Environmental Engineer
Rhodia Inc.
A Member of the Solvay Group

Attachments

cc: Chief, Air Branch
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Executive Director
Texas Commission on Environmental Quality
MC 109
P.O. Box 13087
Austin, TX 78711-3087

Bureau Chief
Bureau of Air Quality Control
Health and Human Services Department
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441

# Form OP-CRO1
# Certification by Responsible Official
# Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

## I. IDENTIFYING INFORMATION

| | | |
|---|---|---|
| A. RN: 100220581 | B. CN: 600125330 | C. Account No.: HG-0697-O |
| D. Permit No.: O-3049 | E. Project No.: | |
| F. Area Name: Houston Plant | | |
| G. Company Name: Rhodia Inc. | | |

## II. CERTIFICATION TYPE *(Please mark the appropriate box)*

| | |
|---|---|
| A. ☐ Responsible Official: | B. x Duly Authorized Representative: |

## III. SUBMITTAL TYPE *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

| | |
|---|---|
| ☐ SOP/TOP Initial Permit Application | ☐ Update to Permit Application |
| ☐ GOP Initial Permit Application | ☐ Permit Revision, Renewal, or Reopening |

x Other: Title V Semi-Annual Deviation Report

## IV. CERTIFICATION OF TRUTH

**This certification does not extend to information which is designated by the TCEQ as information for reference only.**

I, William McConnell, certify that I am the DAR for this application
*(Certifier Name printed or typed)* *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

*Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).*

A. Time Period: From _____ to _____
*Start Date** *End Date**

OR

B. Specific Dates: 09/30/2013 _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: William J McConnell Signature Date: 9/30/2013

Title: Plant Manager for Rhodia Inc., Member of Solvay Group

# Texas Commission on Environmental Quality
# Federal Operating Permit Form
# PCC - Previous Deviation Reports (Part 2)

| | | | |
|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | **Customer Number** | **CN600125330** |
| **Area Name** | Houston Plant | **Account Number** | **HG-0697-O** |
| **Operating Permit Number** | **O-3049** | **Report Submittal Date** | **9/30/2013** |
| **Certification Period Start Date** | **6/29/2013** | **End Date** | **8/31/2013** |

**Identification of Deviation Reports Submitted During the Certification Period**
(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

| Report Date | Report Description (Name of unit, Name of Rule, Driver for report, etc) | Report Submitted To | Report Previously Certified? (Y/N) |
|---|---|---|---|
| 9/30/13 | Houston Plant Semi-Annual Deviation Report | TCEQ | N |
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# Texas Commission on Environmental Quality
## Federal Operating Permit Form
## PCC – Monitoring Options Selected (Part 3)

| | | | |
|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | **Customer Number** | **CN600125330** |
| **Area Name** | Houston Plant | **Account Number** | **HG-0697-O** |
| **Operating Permit Number** | O-3049 | Report Submittal Date | 09/30/2013 |
| **Certification Period Start Date** | 6/29/2013 | End Date | 8/31/2013 |

| ID Number | | Regulatory Requirement (Rule or Permit No. and Prov.) | Pollutant Monitored | SOP or GOP Index Number | Monitoring Option Used | Dates | | Description/Comments |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | Specific Citation | Begin | End | |
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | Not Applicable. No Monitoring Options Allowed by Permit |
| | | | | | | | | |
| | | | | | | | | |
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# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Regeneration Unit #2 | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

## Operating Permit Requirement for Which Deviations are Being Reported

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| 53 | NA | Permit 4802, SC 1 | SO2 | 40 CFR 63.112b(a)(3) | Standard | 60Kb-0002 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-188 | 8/25/2013 | 2330 | 8/25/2013 | 2340 | 1 | Spent acid leak was observed coming from the pump seal. 172.6 pounds of SO2 were released. | The pump was shut down immediately to stop the leak. Leak was contained within the tank containment area. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Logistics – Spent Acid Tracks | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | **O-3049** | **Report Submittal Date** | 09/30/13 |

**Operating Permit Requirement for Which Deviations are Being Reported**

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| LOAD-1 | NA | Permit 56566, SC 1 | SO2 | 40 CFR 63.112b(a)(3) | Standard | R5211-001 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-191 | 8/28/2013 | 0330 | 8/28/2013 | 0335 | 1 | Driver was unloading trailer and had irritation from SO2 fumes from spent acid. 0.1 pounds of SO2 were released | The pump was shut down immediately to stop the leak. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Logistics – Spent Acid Tracks | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

## Operating Permit Requirement for Which Deviations are Being Reported

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| **Unit ID** | **Group ID** | | | | | | | |
| PRO-UNIT8 | NA | Permit 19282, SC 1 | SO2 | 30TAC 112 | Standard | REG2-0001 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-163_A | 7/8/2013 | 0810 | 7/8/2013 | 1410 | 1 | A small gas leak occurred at the inlet duct of the absorbing tower. 0.3 pounds of SO2 were released. | A work order was generated for equipment repair. |
| IR-ECO-HO-2013-167 | 7/15/2013 | 0735 | 7/15/2013 | 1305 | 1 | A small gas leak occurred at the exit duct of the #1 boiler. 33.7 pounds of SO2 were released. | A work order was generated for equipment repair. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Logistics – Spent Acid Tracks | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

## Operating Permit Requirement for Which Deviations are Being Reported

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| **Unit ID** | **Group ID** | | | | | | | |
| PRO-UNIT8 | NA | Permit 19282, SC 1 | SO2 | 30TAC 112 | Standard | REG2-0001 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-182 | 8/13/2013 | 1300 | 8/13/2013 | 1800 | 1 | A small leak developed on the south side of the Brinks. 0.2 pounds of SO2 were released. | A work order was generated for equipment repair. |
| IR-ECO-HO-2013-186_A | 8/23/2013 | 0800 | 8/23/2013 | 0931 | 1 | A small gas leak occurred on top of absorbing tower on the west side manway. 0.3 pounds of SO2 were released. | A work order was generated for equipment repair. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Logistics – Spent Acid Tracks | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

## Operating Permit Requirement for Which Deviations are Being Reported

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| PRO-UNIT8 | NA | Permit 19282, SC 1 | SO2 | 30TAC 112 | Standard | REG2-0001 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-189 | 8/12/2013 | 0900 | 8/12/2013 | 1626 | 1 | Caustic Scrubber solution was drained to the process sewer where it mixed with residual acid. | The unit was cleared of personnel and a site investigation conducted to prevent this occurrence in the future. |
| IR-ECO-HO-2013-192 | 8/29/2013 | 0830 | 8/29/2013 | 1230 | 1 | A small gas leak occurred at the exit duct of the #1 boiler. 61.2 pounds of SO2 were released. | A work order was generated for equipment repair. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Regeneration Unit #2 | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

**Operating Permit Requirement for Which Deviations are Being Reported**

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| PRO-REGEN2 | NA | Permit 4802, SC 1 | SO2 | 30TAC 112 | Standard | REG2-0002 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-166_A | 7/13/2013 | 1700 | 7/13/2013 | 1730 | 1 | Due to a passing thunderstorm the plant experienced a power failure which caused all vents to go to the caustic scrubber without VCU in service. 3.52 pounds of SO2 were released | Power was restored instantaneously and the unit was started up in less than 30 minutes. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Regeneration Unit #2 | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

## Operating Permit Requirement for Which Deviations are Being Reported

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| PRO-REGEN2 | NA | Permit 4802, SC 1 | SO2 | 30TAC 112 | Standard | REG2-0002 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-185_A | 8/16/2013 | 0700 | 8/16/2013 | 2400 | 1 | A small Oleum Leak occurred from weld failure on a pump. 0.3 pounds of SO2 were released | A work order was generated for equipment repair. |
| IR-ECO-HO-2013-194 | 8/30/2013 | 1956 | 8/30/2013 | 2145 | 1 | Unit shut down due to a complete power failure. 107.6 pounds of SO2 were released | Power was restored and unit was start up as soon as possible. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Regeneration Unit #2 | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 06/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

**Operating Permit Requirement for Which Deviations are Being Reported**

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| PRO-REGEN2 | NA | Permit 4802, SC 1 | SO3 | 30TAC 112 | Standard | REG2-0002 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-185_B | 8/16/2013 | 0700 | 8/16/2013 | 2400 | 1 | A small Oleum Leak occurred from weld failure on a pump. 28.8 pounds of SO3 were released. | A work order was generated for equipment repair. |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Regeneration Unit #2 | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 06/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

**Operating Permit Requirement for Which Deviations are Being Reported**

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | | | | |
| PRO-UNIT8 | NA | Permit 19282, SC 1 | SO3 | 30TAC 112 | Standard | REG2-0001 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-163_B | 7/8/2013 | 0810 | 7/8/2013 | 1410 | 1 | A small gas leak occurred at the inlet duct of the absorbing tower. 30.6 pounds of SO3 were released. | A work order was generated for equipment repair. |
| IR-ECO-HO-2013-186_B | 8/23/2013 | 0800 | 8/23/2013 | 0931 | 1 | A small gas leak occurred on top of absorbing tower on the west side manway. 11.4 pounds of SO3 were released. | A work order was generated for equipment repair. |
| | | | | | | | |
| **Total Deviations:** | | | | | | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

# Texas Commission on Environmental Quality
# Federal Operating Permit Deviation Report Form
# Form Dev Rep (Part 2)
# 30 TAC Chapter 101 Non-Reportable Emission Events

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Permit Holder Name** | Rhodia Inc. | | | | | **Customer Number** | **CN600125330** |
| **Area Name** | Regeneration Unit #2 | | | | | **Account Number** | **HG-0697-O** |
| **Report Period Start Date** | 6/29/13 | **Report Period End Date** | 08/31/13 | **Operating Permit Number** | O-3049 | **Report Submittal Date** | 09/30/13 |

**Operating Permit Requirement for Which Deviations are Being Reported**

| ID Number | | Term & Condition No. | Pollutant | Regulatory Requirement Citation | Type of Requirement | SOP or GOP Index Number | Monitoring Method | Monitoring Frequency |
|---|---|---|---|---|---|---|---|---|
| **Unit ID** | **Group ID** | | | | | | | |
| PRO-REGEN2 | NA | Permit 4802, SC 1 | VOC | 30 TAC 115 | Standard | REG2-0002 | Permit | Permit |

| Dev Item No. | Deviation Period | | | | No. of Dev | Cause of Deviation | Corrective Action Taken to Remedy or Mitigate Deviation Situation |
|---|---|---|---|---|---|---|---|
| | Start | | End | | | | |
| | Date | Time | Date | Time | | | |
| IR-ECO-HO-2013-166_B | 7/13/2013 | 1700 | 7/13/2013 | 1730 | 1 | Due to a passing thunderstorm the plant experienced a power failure which caused all vents to go to the caustic scrubber without VCU in service. 1.13 pounds of VOC were released | Power was restored instantaneously and the unit was started up in less than 30 minutes. |
| | | | | | | | |
| | | | | | | | |
| **Total Deviations:** | | | | | **15** | **Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?** | ☐ YES ☐ NO |

AI/AI/CO

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Steve
Thompson
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*Solvay USA Inc.*
*Houston Plant*

**CERTIFIED MAIL: Return Receipt Requested (7008 0150 0001 2472 2999)**



October 3, 2013

Mr. Jeff Robinson
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Solvay Benzene NESHAP, Subpart FF, Quarterly Report
July 1, 2013 to September 30, 2013
EPA ID No.: TXD008099079

Dear Mr. Robinson:

Solvay USA Inc. formally Rhodia Inc., in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095).

Solvay receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Solvay submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Solvay USA Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.

- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William J. McConnell

William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

Solvay USA Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

**Table 1**

**Solvay USA Inc.**
**Houston, Texas**
**Benzene Waste NESHAP Inspection Requirements**
**For Quarterly Period Ending: September 30, 2013**

| Inspection | Was inspection performed? | Exceptions Noted |
|---|---|---|
| Annual Method 21 inspections of tank covers and openings per 61.343(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of tank covers and openings per 61.343(c) | x Yes<br>Except as Noted | |
| Initial and annual Method 21 inspections of containers per 61.345(a)(1) | x Yes<br>Except as Noted | |
| Initial and quarterly visual inspections of containers per 61.345(b) | x Yes<br>Except as Noted | |
| Annual Method 21 inspections of treatment system openings (Regeneration Unit No. 2) per 61.348(e)(3)(ii) | x Yes<br>Except as Noted | |
| Annual Method 21 inspections of closed vent systems (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(a)(1)(i) | x Yes<br>Except as Noted | |
| Quarterly visual inspections of closed vent systems and control devices (from tanks to TS vapor combustor and Regeneration Unit No. 2 industrial furnace, including the vapor combustor and Regeneration Unit No. 2 industrial furnace) per 61.349(f) | x Yes<br>Except as Noted | |
| Daily inspections of control device continuous monitoring data (temperature of TS vapor combustor and "selected parameter" on Regeneration Unit No. 2 industrial furnace) per 61.354(c) | x Yes<br>Except as Noted | |

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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*Solvay USA Inc.*
*Houston Plant*

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Air/Toxics & Inspection
Coordination Branch
6EN-A

**Certified Mail: Return Receipt Requested (7011 2000 0001 4575 0937)**

April 1, 2014

Air Section Manager
Texas Commission on Environmental Quality
Region 12
5425 Polk Avenue, Suite H
Houston, Texas 77023-1486

RE: Solvay USA Inc.
Houston, Texas
Title V Semi-Annual Deviation Report
Permit No.: O-3049
Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the semi-annual Title V deviation report for the Rhodia Houston, Texas facility which covers the period from September 1, 2013 to March 2, 2014.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

David Laurie
Environmental Engineer
Solvay USA Inc.

Attachments

# Form OP-CRO1
# Certification by Responsible Official
# Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

**I. IDENTIFYING INFORMATION**

| | | |
|---|---|---|
| A. RN: 100220581 | B. CN: 600125330 | C. Account No.: HG-0697-O |
| D. Permit No.: O-3049 | E. Project No.: | |
| F. Area Name: Houston Plant | | |
| G. Company Name: Solvay USA Inc. | | |

**II. CERTIFICATION TYPE** *(Please mark the appropriate box)*

| | |
|---|---|
| A. ☐ Responsible Official: | B. x Duly Authorized Representative: |

**III. SUBMITTAL TYPE** *(Place an "X" in the appropriate box) (Only one response can be accepted per form)*

| | |
|---|---|
| ☐ SOP/TOP Initial Permit Application | ☐ Update to Permit Application |
| ☐ GOP Initial Permit Application | ☐ Permit Revision, Renewal, or Reopening |

x Other: Title V Semi-Annual Deviation Report

**IV. CERTIFICATION OF TRUTH**

**This certification does not extend to information which is designated by the TCEQ as information for reference only.**

I, William McConnell, certify that I am the DAR for this application
*(Certifier Name printed or typed)* *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period in Section IV.A below, or on the specific date(s) in Section IV.B below, are true, accurate, and complete:

*Note: Enter EITHER a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).*

A. Time Period: From _____ to _____
*Start Date** *End Date**

OR

B. Specific Dates: 04/01/2014 _____ _____ _____ _____ _____ _____ _____
*Date 1** *Date 2** *Date 3** *Date 4** *Date 5** *Date 6** *Date 7** *Date 8**

**The Time Period option may only be used when the "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'*

Signature: William J. McConnell Signature Date: 4/1/14

Title: Plant Manager for Solvay USA Inc.

# Texas Commission on Environmental Quality
# Federal Operating Permit Form
# PCC - Previous Deviation Reports (Part 2)

| | | | |
|---|---|---|---|
| **Permit Holder Name** | Solvay USA Inc. | **Customer Number** | **CN600125330** |
| **Area Name** | Houston Plant | **Account Number** | **HG-0697-O** |
| **Operating Permit Number** | **O-3049** | **Report Submittal Date** | **04/01/2014** |
| **Certification Period Start Date** | **9/1/2013** | **End Date** | **03/02/2014** |

**Identification of Deviation Reports Submitted During the Certification Period**
**(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)**

| Report Date | Report Description (Name of unit, Name of Rule, Driver for report, etc) | Report Submitted To | Report Previously Certified? (Y/N) |
|---|---|---|---|
| 04/01/14 | Houston Plant Semi-Annual Deviation Report | TCEQ | N |
| | | | |
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Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.

# Texas Commission on Environmental Quality
## Federal Operating Permit Form
## PCC – Monitoring Options Selected (Part 3)

| | | | |
|---|---|---|---|
| **Permit Holder Name** | Solvay USA Inc. | **Customer Number** | **CN600125330** |
| **Area Name** | Houston Plant | **Account Number** | **HG-0697-O** |
| **Operating Permit Number** | O-3049 | Report Submittal Date | 04/01/2014 |
| **Certification Period Start Date** | 09/01/2013 | End Date | 03/02/2014 |

| ID Number | | Regulatory Requirement (Rule or Permit No. and Prov.) | Pollutant Monitored | SOP or GOP Index Number | Monitoring Option Used | Dates | | Description/Comments |
|---|---|---|---|---|---|---|---|---|
| Unit ID | Group ID | | | | Specific Citation | Begin | End | |
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | Not Applicable. No Monitoring Options Allowed by Permit |
| | | | | | | | | |
| | | | | | | | | |
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Coordination Branch
6EN-A

*Solvay USA Inc.*
*Houston Plant*

**CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 4188)**

February 18, 2014

Texas Commission on Environmental Quality
Office of Permitting, Remediation and Registration
Air Permits Division, MC-163
P.O. Box 13087
Austin, Texas 78711-3087

Re: Solvay USA Inc. (CN600125330)
Houston Plant (RN100220581)
Air Permit No.: 4802/PSD-TX-1260
NSPS Notification of Initial
Account No.: HG-0697-O

To Whom it May Concern:

This letter provides notification to the Texas Commission on Environmental Quality (TCEQ) concerning startup of the sulfur dioxide ($SO_2$) abatement system in the Regeneration Unit No. 2 sulfuric acid plant on February 7, 2014 at the Solvay USA Inc. (formally named Rhodia Inc.) facility located in Houston, Texas.

As the TCEQ is aware, Solvay entered into a consent decree with the U.S. Environmental Protection Agency on July 23, 2007. As a part of that consent decree, Solvay agreed to comply with the requirements set forth in NSPS Part 60, Subparts A and H at a number of facilities, including the Houston Regeneration Unit No. 2. Specifically, the consent decree requires Regeneration Unit No. 2 to reduce its $SO_2$ emissions to 1.8 lbs/ton of sulfuric acid produced by April 1, 2014. The consent decree further requires the facility to comply with certain monitoring, reporting, and recordkeeping provisions set forth in NSPS Part 60, Subparts A and H.

Part of the compliance effort, Solvay started the $SO_2$ abatement system on February 7, 2014 to comply with the above-referenced consent decree and now-applicable NSPS regulations. This notification is therefore, being protectively submitted pursuant to 40 § C.F.R. 60.7(a)(3) that requires "notification of the actual date of initial startup of an affected facility postmarked with 15 days after such date.".

Please contact me at (713) 924-1408 if you require any additional information on this matter.

Sincerely,

W. F. Dickerson
Environmental Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department
EPA Region 6, New Source Review Program, 1445 Ross Avenue, Dallas, TX 75202-2733

Solvay USA Inc.
Houston Plant
8615 Manchester Street
Houston, TX 77012

A1/AL/CO

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6EN-AA

Rhodia

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*Houston Plant*

**CERTIFIED MAIL: Return Receipt Requested (7011 2000 0001 4575 0517)**

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JAN 31 2014

Air/Toxics & Inspection Coordination Branch 6EN-A

January 27, 2014

Mr. Jeff Robinson
Chief, Air Permits Section (6PD-R)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Solvay Benzene NESHAP, Subpart FF, Quarterly Report
October 1, 2013 to December 31, 2013
EPA ID No.: TXD008099079

Dear Mr. Robinson:

Solvay USA Inc., in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095).

Solvay receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Solvay submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

- Pursuant to 40 CFR 61.357(d)(6), Solvay USA Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.

- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William McConnell
Plant Manager

cc: Air Section Manager, TCEQ, Region 12
Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston
Mr. Bob Allen, Director, Harris County Pollution Control Department

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